

REMARKS

Status of the Claims

Claims 1 and 3-45 were pending in this application with claims 4-41 being withdrawn from consideration in a previous restriction requirement. In this response, Applicant has amended claim 45 to correct claim dependency and claims 12 and 13 have been amended to remove reference numerals from the claims. No claims have been added or cancelled.

Applicant's recently added claims 42-45 were subject to a restriction requirement in the office action. Applicant confirms the selection of claims 1, and 3-41, directed to the apparatus (indicated as invention II in the September 29, 2010 office action) and thus, the recently added method claims are withdrawn from consideration. This election is without traverse and Applicant reserves the right to file a divisional application on these claims at a later time.

Accordingly, in view of the above, claims 1 and 3-41 are pending with claims 4-45 being withdrawn from consideration.

In the office action, claims 1 and 3 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Urquhart (U.S. Pat. No. 4,772,374) in view of Ehrenleitner (U.S. Pat. Pub. No. 2003/0056723 A1).

Applicant respectfully traverses the rejection and requests reconsideration of same in light of the following arguments.

Arguments

Applicant submits that the obviousness rejection must fail because there is no motivation or teaching to combine the teachings of Urquhart and Ehrenleitner and even if the two references were combined, the combination would change the principal mode of operation of the devices in Urquhart.

Ehrenleitner is a device which is used for dip-coating where the possibilities of movement (kinematics) have another meaning than in Urquhart. In Ehrenleitner, the kinematics of the dip process are of relevance where, as an example, the dip curve is selected such that the length of the bath can be minimized. In Urquhart and in the present invention, the purpose of moving the object is to present all faces of the object properly to the source of radiation. Thus, Applicant submits that one of ordinary skill in the art would not be motivated to combine the two

references as suggested in the office action.

Moreover, Applicant submits that combining the two references would frustrate the mode of operation of the devices in Urquhart. Specifically, Urquhart is concerned with applying a substrate to all surfaces of a work object. *See*, col. 1 lines 40-58. In the drying stages, Urquhart specifically discloses that it is advantageous to oscillate the work piece while it is in the drying oven. *See*, col. 3, lines 46-54. This oscillation and the translational movement results in wetting and improved cleaning and rinsing of the work piece. *See*, col. 10 lines 21-26. However, if the device of Urquhart were modified as suggested, the oscillation, which is the purpose through which the devices of Urquhart achieve their goals, would be rendered useless. Thus, Applicant submits that the proposed modification would change the principal mode of operation of Urquhart.

Therefore, in view of the above, Applicant submits that obviousness rejection fails as there is no motivation or teaching to modify the devices of Urquhart as suggested. Thus, claim 1 is patentable over the cited prior art.

Since claim 1 is patentable over the cited art, Applicant submits that the remaining dependent claims should be patentable as they depend from a patentable independent claim.

CONCLUSION

In view of the above, it is submitted that the present application is in condition for issuance and a notice of allowance is respectfully solicited.

If any additional fees are required with this correspondence, the Commissioner is authorized to debit our Deposit Account 50-0545.

Should anything further be required, a telephone call to the undersigned at (312) 226-1818 is respectfully solicited.

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Respectfully Submitted,

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